April 10, 2003

Mr. Toshi Ohki
H. A. Parts Products of Indiana Company
2200 State Road 240 East
Greencastle, Indiana 46135

Re: 133-16849
1st Significant Permit Modification to
Part 70 133-12660-00019

Dear Mr. Toshi Ohki:

H. A. Parts Products of Indiana Company, located at 2200 State Road 240 East, Greencastle, Indiana 46135 was issued a Part 70 permit on March 19, 2002 for a stationary plastic automotive trim molding and surface coating operations. A letter requesting changes to this permit was received on November 27, 2002 in order to incorporate the following requirements of Agreed Order Case No. 2000-9022-A in the Part 70 T133-12660-00019, issued on March 19, 2002. Pursuant to the provisions of 326 IAC 2-7-12 significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

(a) Condition No. 4 of the Order requires the source to reduce the actual VOC and HAP emissions from the mask washing processes from 37.50 tons per year to 4.74 tons per year by installing a solventless mask washer and by removing mask washers identified as mask washers # 5 and # 6.

(b) Condition No. 5 of the Order also requires the source to keep log on monthly solvent usage for remaining mask washers # 1 and # 7 to demonstrate with the VOC and HAP limit of 4.74 tons per year.

Pursuant to the provisions of 2-7-12, the permit change which will include new applicable requirements qualifies as a Significant Permit Modification (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

(1) Section A.2 Emission Units and Pollution Control Equipment Summary will be amended to remove items (i) and (j):

~~(i) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

~~(j) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

(~~k~~ **i**) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

This change will also be reflected in Section D.2 as follows:

Section D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
New Paint Room

(f) one (1) robot paint spray system, consisting of the following:
- (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;
- (2) one (1) Primer coat flash/setting zone, exhausting through one (1) stack, identified as NPP-3;
- (3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
- (4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
- (5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;
- (6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
- (7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.

(g) one (1) paint line, identified as the Small Parts Line, consisting of the following:
- (1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
- (2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
- (3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;

(h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
- (1) one (1) Loading Clean Room;
- (2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
- (3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
- (4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
- (5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);

(6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
(7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
(8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
(9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);
(10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);
(11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
(12) one (1) clean room for unloading of painted parts.

~~(i) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

~~(j) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

(~~k~~ **i**) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.3 **Volatile Organic Compounds and** Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) Pursuant to Agreed Order Case No. 2000-9022-A, the VOC and HAP input usage from Mask Washer # 7 and Mask Washer # 1 of Section D.1 shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) Any change or modification which increases emissions from the robot paint spray system, the Small Parts line, ~~or~~ the robot paint conveyor system, ~~Mask Washer #5, Mask Washer #6~~, **including** ~~or~~ Mask Washer #7 of any single HAP or any combination of HAPs to greater than 10 and 25 tons per year, respectively, shall be subject to the requirements of 326 IAC 2-4.1-1 and must be approved by the Office of Air Quality before such change can occur.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) ~~for Mask Washer #5, Mask Washer #6, and~~ **the** Mask Washer #7, which ~~are~~ **is a** cold cleaning operation~~s~~ constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for ~~Mask Washer #5, Mask Washer #6, and~~ Mask Washer #7, the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met ...:

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1, ~~and~~ D.2.2 **and D.2.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.9 VOC Emissions

Compliance with Conditions D.2.1 ~~and~~ D.2.2 **and D.2.3** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, ~~and~~ D.2.2 **and D.2.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

The following reporting form is added for condition D.2.3:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
1st Significant Permit Modification: 133-16849
Part 70 Permit No.: T133-12660-00019
Facility: Mask washer # 1 and Mask Washer #7
Parameter: VOC and HAP usages
Limit: Pursuant to Agreed Order Case No. 2000-9022-A, VOC and HAP usages shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

QUARTER:_____ YEAR: _____

Month	Column 1	Column 2	Column 1 + 2
	VOC and HAP Usage This Month (tons)	VOC and HAP Usage Previous 11 Months (tons)	12 Month Total VOC and HAP Usage (tons)
1st Month			
2nd Month			
3rd Month			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Putnam County
U.S. EPA, Region V
Putnam County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner
Enforcement Section

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

H.A. Parts Products of Indiana Company
2200 State Route 240 East
Greencastle, Indiana 46135

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T133-12660-00019	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 19, 2002 Expiration Date:

1st Administrative Amendment 133-15969, issued June 18, 2002

1st Significant Permit Modification 133-16849	Pages Affected: 6, 29, 30, 32, 33, 41 Pages Added: 41a
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: April 10, 2003

(3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
(4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
(5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;
(6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
(7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.

(g) one (1) paint line, identified as the Small Parts Line, consisting of the following:
(1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
(2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
(3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;

(h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
(1) one (1) Loading Clean Room;
(2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
(3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
(4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
(5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);
(6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
(7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
(8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
(9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);
(10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);
(11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
(12) one (1) clean room for unloading of painted parts.

(i) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

Co-Extrusion

(j) eight (8) co-extrusion lines, identified as CX101, CX103, CX106, CX108, CX109, CX110, CX111, and CX113, all constructed in 1989, each utilizing a roller coating system for adhesive application, each exhausting through one (1) stack, with CX101 exhausting through stack F4, CX108 exhausting through E1, CX106 and CX113 exhausting through stack E2, and CX103, CX109, CX110, and CX111 exhausting through stack E3;

(11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and

(12) one (1) clean room for unloading of painted parts.
  (i) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP-133-8608-00019, issued October 6, 1997, the best available control technology (BACT) for the two (2) paint lines (the robot paint spray system and the Small Parts Line) shall be:

(1) the use of a high volume low pressure (HVLP) spray application system with a closed loop internal mix manifold system;
(2) the use of a water wash system for overspray control, consisting of a water fall and water pan, at all times during which the robot paint spray system and the Small Parts Paint Line are in operation; and
(3) The total amount of VOC delivered to the applicators of the robot paint spray system and the Small Parts Line shall not exceed 63.6 tons per twelve (12) consecutive month period. This usage limit is equivalent to 63.6 tons of VOC per twelve (12) consecutive month period.

(b) Pursuant to Significant Source Modification No. 133-14228-00019, pending with the OAQ, the operation of the robot paint conveyor system without the use of add-on controls and with the following work practice and emission limitation will satisfy the BACT requirements:

(1) The coatings applied in each of the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall be applied using High Volume Low Pressure (HVLP) Spray Application guns.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) The total usage of VOC in the primer coat spray booth, the base coat spray booth, and the clear coat spray booth shall not exceed 97.85 tons per twelve (12) consecutive month period. This usage limit is equivalent to 97.85 tons of VOC per twelve (12) consecutive month period.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total input of VOC to the robot paint spray system, the Small Parts line, and the robot paint conveyor system shall not exceed 138.07 tons per 12 consecutive month period, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.3 Volatile Organic Compounds and Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) Pursuant to Agreed Order Case No. 2000-9022-A, the VOC and HAP input usage from Mask Washer # 7 and Mask Washer # 1 of Section D.1 shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) Any change or modification which increases emissions from the robot paint spray system, the Small Parts line, or the robot paint conveyor system of any single HAP or any combination of HAPs to greater than 10 and 25 tons per year, respectively, shall be subject to the requirements of 326 IAC 2-4.1-1 and must be approved by the Office of Air Quality before such change can occur.

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to CP 133-8608-00019, issued on October 6, 1997, and pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the robot paint spray system and the Small Parts Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(b) Pursuant to Significant Source Modification 133-14228-00019, pending with the OAQ, and pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the primer coat, base coat, and the clear coat spray booths of robot paint conveyor system shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Mask Washer #7, which is a cold cleaning operation constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for Mask Washer #7, the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met :

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated

with one (1) hand if:

Compliance Determination Requirements

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1, D.2.2 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.9 VOC Emissions

Compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.10 Particulate Matter (PM)

In order to comply with Condition D.2.4, each of the closed loop internal mix systems and water wash systems for PM control shall be in operation and control emissions from the Prime coat booth, the Base coat booth, and the Clear coat booth of the robot paint spray system, the Small Parts Booth, and the primer coat, base coat, and the clear coat spray booths of the robot paint conveyor system at all times when these paint booths are in operation.

D.2.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the water wash systems. To monitor the performance of the water wash systems, weekly observations shall be made of the overspray from the surface coating booth stacks (Stack IDs NPP-1, NPP-2, NPB-1, NPB-2, NPB-3, NPC-1, NPC-2, NPS-1, NPS-2, #2, #5, #6, and #9) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2 and the maximum HAP emissions established in Condition D.2.3.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Conditions D.2.10 and D.2.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
1st Significant Permit Modification: 133-16849
Part 70 Permit No.: T133-12660-00019
Facility: Mask washer # 1 and Mask Washer #7
Parameter: VOC and HAP usages
Limit: Pursuant to Agreed Order Case No. 2000-9022-A, VOC or HAP usages shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC and HAP Usage This Month (tons)	VOC and HAP Usage Previous 11 Months (tons)	12 Month Total VOC and HAP Usage (tons)
1st Month			
2nd Month			
3rd Month			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification

Source Background and Description

Source Name:	H. A. Parts Products of Indiana Company
Source Location:	2200 State Road 240 East, Greencastle, IN 46135
County:	Putnam
SIC Code:	3089, 3465
Operation Permit No.:	T 133-12660-00019
Operation Permit Issuance Date:	March 19, 2002
Significant Permit Modification No.:	SPM 133-16849
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from H. A. Parts Production of Indiana Company, a plastic automotive trim molding and surface coating plant. The modification involves changes to this permit in order to incorporate the following requirements of Agreed Order Case No. 2000-9022-A, issued by the Indiana Department of Environmental Management (IDEM), Office of Enforcement on July 3, 2002 in the Part 70 T133-12660-00019.

(a) Condition No. 4 of the Order requires the source to reduce the actual VOC and HAP emissions from the mask washing processes from 37.50 tons per year to 4.74 tons per year by installing a solventless mask washer and by removing mask washers identified as mask washers # 5 and # 6.

(b) Condition No. 5 of the Order also requires the source to keep log on monthly solvent usage for remaining mask washers # 1 and # 7 to demonstrate with the VOC and HAP limit of 4.74 tons per year.

History

On November 27, 2002, H. A. Parts Products of Indiana Company submitted an application to the OAQ requesting a change in their Part 70 permit to comply with the requirements of Agreed Order Case No. 2000-9022-A . H. A. Parts Products of Indiana Company was issued a Part 70 permit March 19, 2002.

Existing Approvals

The source was issued a Part 70 Operating Permit (T133-12660-00019) on March 19, 2002. The source has since received the following:

(a) First Administrative Amendment No.: 133-15969, issued on June 18, 2002; and

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Emission Calculations

The permit change would not result in any emission.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	None
PM-10	
SO_2	
VOC	
CO	
NO_x	

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

(a) The Agreed Order requires the source to remove two (2) mask washers in order to reduce the VOC emissions from the existing mask washing operations. Therefore, this permit change will result in an emission reduction at the source.

With the change new applicable requirements will be added in the permit and therefore, will require a Significant Permit Modification under 326 IAC 2-7-12.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this permit modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this permit modification.

State Rule Applicability -

There are no state rules applicable, as the change does not involve a construction, modification, or reconstruction of an emission unit.

Changes to the Part 70 Permit

The following are changes to the Part 70 Permit (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

(1) Section A.2 Emission Units and Pollution Control Equipment Summary will be amended to remove items (i) and (j):

~~(i) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

~~(j) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

(~~k~~ **i**) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

This change will also be reflected in Section D.2 as follows:

Section D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
New Paint Room

(f) one (1) robot paint spray system, consisting of the following:
- (1) one (1) Primer coat spray booth (NPP), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPP-1 and NPP-2;
- (2) one (1) Primer coat flash/setting zone, exhausting through one (1) stack, identified as NPP-3;
- (3) one (1) Base coat spray booth (NPB), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through three (3) stacks, identified as NPB-1, NPB-2, and NPB-3;
- (4) one (1) Base coat flash/setting zone, exhausting through one (1) stack, identified as NPB-4;
- (5) one (1) Clear coat spray booth (NPC), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 40 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPC-1 and NPC-2;

(6) one (1) Clear coat flash/setting zone, exhausting through one (1) stack, identified as NPC-3;
(7) two (2) natural gas-fired bake ovens, each with a maximum heat input of 0.8 million (MM) British thermal units (Btu) per hour;

Note: The robot paint spray system was previously referred to as the Large Parts Line in CP-133-8608-00019, issued October 6, 1997.

(g) one (1) paint line, identified as the Small Parts Line, consisting of the following:
(1) one (1) paint spray booth, identified as Small Parts Booth (NPS), constructed in 1999, utilizing a High Volume Low Pressure (HVLP) spray application system, coating a maximum of 25 plastic automotive trim pieces per hour, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks, identified as NPS-1 and NPS-2;
(2) one (1) natural gas-fired bake oven (NPSO), constructed in 1999, with a maximum heat input of 0.4 MMBtu per hour, exhausting through one (1) stack, identified as NPSO-1; and
(3) one (1) Small Parts cool down (NPSD), exhausting through one (1) stack, identified as NPSD-1;

(h) one (1) robot paint conveyor system, constructed in 2001, consisting of the following:
(1) one (1) Loading Clean Room;
(2) one (1) Primer coat pump room, exhausting through one (1) stack (ID Stack #1);
(3) one (1) Primer coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #2);
(4) one (1) Primer coat flash off tunnel, exhausting through one (1) stack (ID Stack #3);
(5) one (1) Base coat pump room, exhausting through one (1) stack (ID Stack #4);
(6) one (1) Base coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through two (2) stacks (ID Stacks #5 and #6);
(7) one (1) Base coat flash off tunnel, exhausting through one (1) stack (ID Stack #7);
(8) one (1) Clear coat pump room, exhausting through one (1) stack (ID Stack #8);
(9) one (1) Clear coat spray booth, equipped with a closed loop internal mix system and a water wash system for particulate matter overspray control, exhausting through one (1) stack (ID Stack #9);
(10) one (1) Clear coat flash off tunnel, exhausting through one (1) stack (ID Stack #10);
(11) one (1) convection curing oven, exhausting through three (3) stacks (ID Stacks #11, #12, and #13), equipped with two (2) indirect natural gas-fired heater boxes, each rated at 1.5 million British thermal units (MMBtu) per hour, exhausting through two (2) stacks (ID Stacks #14 and #15); and
(12) one (1) clean room for unloading of painted parts.

~~(i) one (1) Mask washer, identified as Mask Washer #5, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

~~(j) one (1) Mask washer, identified as Mask Washer #6, constructed in 1999, using a maximum of 7.5 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-3;~~

(~~k~~ **i**) one (1) Mask washer, identified as Mask Washer #7, constructed in 1999, using a maximum of 6.0 gallons per day of solvent, exhausting through one (1) stack, identified as NPM-2;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.3 **Volatile Organic Compounds and** Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) Pursuant to Agreed Order Case No. 2000-9022-A, the VOC and HAP input usage from Mask Washer # 7 and Mask Washer # 1 of Section D.1 shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

(b) Any change or modification which increases emissions from the robot paint spray system, the Small Parts line, ~~or~~ the robot paint conveyor system, ~~Mask Washer #5,~~

~~Mask Washer #6~~, **including** ~~or~~ Mask Washer #7 of any single HAP or any combination of HAPs to greater than 10 and 25 tons per year, respectively, shall be subject to the requirements of 326 IAC 2-4.1-1 and must be approved by the Office of Air Quality before such change can occur.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) ~~for Mask Washer #5, Mask Washer #6, and~~ **the** Mask Washer #7, which ~~are~~ **is a** cold cleaning operation~~s~~ constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for ~~Mask Washer #5, Mask Washer #6, and~~ Mask Washer #7, the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met ...:

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1, ~~and~~ D.2.2 **and D.2.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.9 VOC Emissions

Compliance with Conditions D.2.1 ~~and~~ D.2.2 **and D.2.3** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, ~~and~~ D.2.2 **and D.2.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

The following reporting form is added for condition D.2.3:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: H.A. Parts Products of Indiana Company
Source Address: 2200 State Road 240 East, Greencastle, Indiana 46135
Mailing Address: P.O. Box 157, Greencastle, Indiana 46135
1st Significant Permit Modification: 133-16849
Part 70 Permit No.: T133-12660-00019
Facility: Mask washer # 1 and Mask Washer #7
Parameter: VOC and HAP usages
Limit: Pursuant to Agreed Order Case No. 2000-9022-A, VOC and HAP usages shall be limited to 4.74 tons per 12 consecutive month period with compliance determined at the end of each month.

QUARTER:_____ YEAR: _____

Month	Column 1	Column 2	Column 1 + 2
	VOC and HAP Usage This Month (tons)	VOC and HAP Usage Previous 11 Months (tons)	12 Month Total VOC and HAP Usage (tons)
1st Month			
2nd Month			
3rd Month			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The permit change shall be subject to the conditions of the attached **Significant Permit Modification 133-16849-00019.**